

REMARKS/ARGUMENTS

In an Office Action dated December 9, 2005 claims 1, 5, 6, 9-12, 16, 19, 24, 27, 31, 32, 36 and 37 were rejected under § 103 based on Heil, claims 8, 18 and 39 were rejected under § 112, claims 2-4, 7, 13-15, 17, 20-23, 28-30, 33-35 and 38 were objected to and claims 25 and 26 were allowed. Applicants respectfully traverse the rejections and request consideration of the following arguments.

Claim Amendments

Claims 8, 18 and 39 have been amended to correct an antecedent basis error. Claims 1, 12, 19, 27 and 32 are amended to clarify that management data is fabric management data, even though such was clear from the context of the claims. Claims 2, 4, 13, 15, 33 and 35 have been amended to correspond with the changes to claims 1, 12 and 32.

§ 103 Rejections

Claim 1

Claim 1 was rejected under § 103 over Heil. Applicants traverse the rejection.

While Applicants admit that the fabrics 138 and 140 of Heil are independent switching fabrics and the bus/switch bridge 150 (more commonly referred to as an HBA or host bus adapter) has general interfaces to each fabric, Applicants disagree as to the requirements of transmitting and receiving fabric management data and the presence of the inter-fabric adjunct processor. As to the management data, the Office Action referenced col. 7, lines 44-47: "The host devices 114 access the stored data in the storage devices 122, 124 and 126 through the switched fabrics 136, 138 and 140" The stored data on the storage devices of Heil is not fabric management data, the required data of interest in the claim. Examples of fabric management data are provided at paragraphs 40 to 46 of the present application, but generally the data relates to management of the fabrics themselves. This is in contrast to data stored on the storage devices of Heil and operated on by the hosts. The Office Action cites col. 6, line 57 to

col. 7, line 1 but this section only describes in slightly greater detail the process of obtaining data from a storage device and providing it to a host. This data is not fabric management data as required in the claims.

As Heil does not teach or suggest transmitting or receiving fabric management data or an inter-fabric adjunct processor to analyze and respond to the fabric management data, claim 1 and those dependent therefrom are allowable over Heil. Reconsideration is requested.

Claim 9

Claim 9 was rejected under § 103 over Heil. Applicants traverse the rejection.

Applicants submit that Heil does not teach or suggest any of the elements of claim 9, at least because Heil does not teach or suggest the inter-fabric services device and thus cannot have the agents. The Office Action alleges that the RAID server 134 is the inter-fabric services devices but admits that Heil does not disclose logically managing the first and second fabrics as a single entity. The Office Action then goes on to equate conventional host to storage device data transfer operations as the required logical management. Applicants vigorously disagree with this step. Claim 9 relates to managing the fabrics themselves as a single entity. The conventional host to storage device data transfer is not at all akin to management of a fabric. Again reference is requested to paragraphs 40 to 46 for examples of management services, along with paragraphs 19, 64, 65, 69 and 77 of the present application. The host 104 in Heil simply transfers data with the storage devices. These are not fabric management operations in any sense and clearly the host 104 does not treat the two fabrics as a single entity as it does not even know they exist. Heil simply has nothing close and suggests nothing close to the required inter-fabric services device.

As Heil does not teach or suggest the inter-fabric services device, it cannot teach or suggest the agents coupled to the inter-fabric services device as further required in claim 9.

Applicants therefore submit that claim 9 and its dependent claims are allowable over Heil. Reconsideration is requested.

Claim 10

Claim 10 was rejected based on an analogy to a dual-ported drive having two links for failover protection. Applicants submit this rejection basis may indicate a failure to appreciate that claim 10 requires a full second inter-fabric services device, not just a second link from the first inter-fabric services device. Providing a redundant link from a single device is not equivalent to the providing of an entire second device, in the case of claim 10 positioned such that a fully redundant inter-fabric service link is provided. Reconsideration is requested.

Claim 12

Claim 12 effectively includes the elements of claim 1 as the device of claim 9. As the rejection of claim 12 is similar to the rejection of claim 1, similar arguments made with respect to claim 1 apply equally so that claim 12 is allowable.

Claim 19

Claim 19 was rejected for similar reasons as claim 1 and the claim 1 arguments apply equally. Applicants submit that claim 19 is allowable.

Claim 27

Claim 27 was rejected for similar reasons as claim 1 and the claim 1 arguments apply equally. Applicants submit that claim 27 is allowable.

Claim 32


Claim 32 was rejected for similar reasons as claim 1 and the claim 1 arguments apply equally. Applicants submit that claim 32 is allowable.

CONCLUSION

Based on the above remarks Applicants respectfully submit that all of the present claims are allowable. Reconsideration is respectfully requested.

Respectfully submitted,

3/9/06
Date

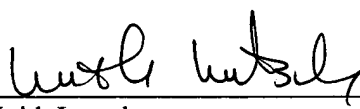

Keith Lutsch, Reg. No. 31,851

Wong, Cabello, Lutsch,
Rutherford & Brucculeri, L.L.P.
20333 State Highway 249, Suite 600
Houston, TX 77070
832/446-2405
832/446-2424 (facsimile)

CERTIFICATE OF MAILING
37 § C.F.R. 1.8

I hereby certify that this correspondence is being deposited with the U.S. Postal Service with sufficient postage as First Class Mail in an envelope addressed to Commissioner for Patents, P.O. Box 1450, Alexandria VA, 22313-1450, on the date below.

3/9/06
Date


Keith Lutsch